

*REMARKS/ARGUMENTS*

In response to the Office Action mailed April 9, 2007, Applicant amends his application and requests reconsideration. In this Amendment claims 5, 9, 14, 46, 52, and 53 are newly cancelled. Accordingly, claims 4, 6, 8, 10, 11, 45, and 49-51 remain pending.

Applicant respectfully notes that a minor error in the PTO-892 Form that accompanied the Official Action. The final cited reference is incorrectly identified. The correct reference, cited in the Office Action, is U.S. Patent 4,819,866 to Kenyon. Two of the numbers of the patent were interchanged in preparing the PTO-892 Form. Correction by citation of Kenyon on an additional PTO-892 Form supplied with the next communication, so that that reference is of record in this prosecution, is respectfully requested.

The rejection pursuant to 35 USC 112, second paragraph of claim 49 has been overcome by removing the paragraph including language referring to a person.

In this Amendment, claims 49 and 9 are combined as amended claim 49. This amendment necessitates the cancellation of claim 5 as redundant and the amendment of claim 4 to avoid redundancy. Amended claim 49 is the only remaining independent claim.

The invention as defined by claim 49 is directed to a currency control system, particularly in a gaming environment. The system includes a portable safe for holding currency and a game-related device to which the portable safe may be removably attached. When the portable safe is attached to the game-related device, the safe functions to hold currency, receive currency inserted for using the game-related device, and to supply currency discharged for the game-related device, for example upon the payment of a cash prize.

The system also includes a currency control device to which the portable safe is removably attachable. The currently control device is located remotely with respect to the game-related device. When the portable safe is attached to the currency control device, currency can be transferred into the portable safe or retrieved from the portable safe. In other words, the portable safe provides at each of multiple locations currency

receiving and dispensing functions. For example, at the currency control device, collections from playing of the game-related device may be retrieved and placed in a central depository. Likewise, currency for discharge as prize money may be charged into the portable safe at the currency control device. Similar, but inverted functions are provided at the game-related device, namely discharging cash as prizes and collecting cash paid to operate the game-related device.

Clearly, an important function of the portable safe is the transfer of money in both of two directions while avoiding and detecting theft. In one direction, currency is transferred from the currency control device to the game-related device. In the other direction, currency is transferred from the game-related device to the currency control device. In both instances, since the currency is present in the portable safe, it is important that the measures employed to protect against the theft of the portable safe be employed. This important feature of the invention is made clear in amended claim 49.

Amended claim 49 explains that the anomaly detection device detects a connection anomaly when the portable safe is, for too long a period of time, not a connected to at least one of the game-related device or the currency control device. Thus, this system ensures that when the portable safe is being transported, no matter which direction the portable safe is travelling between the game-related device and the currency control device, the anomaly detection device functions to warn of a potential theft when the transportation takes too long.

Claims 9 and 49, along with many other examined claims, were rejected as unpatentable over Cassidy et al. (U.S. Patent 5,615,625, hereinafter Cassidy) in view of Dobbins (published U.S. Patent Application 2002/0063034), and further in view of Blad et al. (published U.S. Patent Application 2002/0063035, hereinafter Blad). This rejection is respectfully traversed with respect to the claim 49 that is presented here. If *prima facie* obviousness of amended claim 49 is not established by the combination of three references, then all remaining pending claims are patentable. For that reason, only the rejection with respect to amended claim 49 is discussed here.

Dobbins and Blad were cited with respect to wirelessly networked safes and the use of currency containers with respect to gaming machines, respectively. Assuming for the sake of argument that those publications stand for the propositions cited, then in order

for *prima facie* obviousness to have been established, Cassidy must describe the remainder of the apparatus defined by amended claim 49.

Cassidy is directed to a system in which valuable articles, such as cash, are collected at a deposit station that is typically located at the premises of a business. Through the use of a docking station at the deposit station, the valuable articles are collected into an "intelligent" container 20. In order for the valuables to reach a bank for deposit, the container 20 is transported to a depot station, which is typically located at a bank or other financial institution. The deposit station and the depot station are interconnected through a computer network. In the use of the system described by Cassidy, an empty container 20 is transported to a deposit station and mounted on a docking station that processes valuable articles, such as bank notes and checks. The valuable articles are transported through the use of rollers and other conventional conveying apparatus into respective slots or doors of the container 20. Thereafter, when the valuables have been collected within the container, the container 20 is detached from the docking station and transported to the depot station.

Cassidy describes numerous elements for detecting unauthorized access to and theft of a container that has been filled with valuable articles. Sensors detect burning, submersion, drilling, and tilting of such a filled container, for example. When some kind of unauthorized attempt, an anomaly, to obtain access to the contents of the container is detected, in Cassidy, a dye dispenser is actuated which marks the valuable articles as stolen and prevents their subsequent redemption without detection of the theft.

Perhaps the most pertinent passage of Cassidy, with respect to amended claim 49, appears at column 5, lines 19-22. According to that passage, the time that elapses after a container is dispatched from the deposit station is monitored. If that elapsed time exceeds a time limit, the dye pack is detonated. Further, the monitor can trigger the dye pack if a plug is not continuously connected to a socket carried by a guard who is responsible for transporting the container. (Column 5, lines 42-44).

What is described in claim 49 and is not disclosed or suggested by Cassidy is the constant monitoring of the time elapsed between disconnection of the container 20 from both of the deposit station and the depot station. The reason that elapsed time is not measured with respect to transportation from the depot station is plainly apparent from

Cassidy. When a container is disconnected from a depot station, it is empty. Then, the container is transported to a deposit station where the container can be filled. There is no description of monitoring the elapsed time in that direction of transportation because there is no security risk with respect to the stealing of valuable articles that are not present within the container 20.

By contrast, in the system according to the invention, the portable safe always contains currency during transportation between the currency control device, which roughly corresponds to the depot station of Cassidy, and the game-related device which might be considered to roughly, but not identically, correspond to the game-related device of the claimed system. Thus, it is critical in the invention that the elapsed time of transportation be monitored no matter in which direction that portable safe is being transported. There is no reason or motivation to modify Cassidy to meet this important feature of the claimed invention because there is nothing valuable to be diverted or stolen when the Cassidy container 20 is transported from the depot station to the deposit station.

Because of the foregoing difference, Cassidy, even considered in combination with Dobbins and Blad, cannot establish *prima facie* obviousness as to amended claim 49 or any of the other claims that remain pending, all of which depend directly or indirectly from amended claim 49.

Reconsideration and allowance of the claims now pending are earnestly solicited.

Respectfully submitted,



Jeffrey A. Wyand, Reg. No. 29,458  
LEYDIG, VOIT & MAYER  
700 Thirteenth Street, N.W., Suite 300  
Washington, DC 20005-3960  
(202) 737-6770 (telephone)  
(202) 737-6776 (facsimile)

Date:

October 2, 2007

JAW/jj